

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. No. __

**ORDER SUSTAINING DEBTORS' FORTY-FIRST (NON-SUBSTANTIVE)
OMNIBUS OBJECTION TO CERTAIN
SUPERSEDED CLAIMS (CUSTOMER CLAIMS)**

Upon the forty-first omnibus objection (the “Objection”)² of FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (collectively, the “Debtors”), for entry of an order (this “Order”) sustaining the Objection and disallowing and expunging in their entirety the Superseded Claims set forth in Schedule 1 attached hereto; and this Court having jurisdiction to consider the Objection pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court being able to issue a final order consistent with Article III of the United States Constitution; and venue of these Chapter 11 Cases and the Objection in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that proper and adequate notice of the Objection and the relief requested therein has been provided in accordance with the Bankruptcy Rules and the Local Rules, and that, except as otherwise ordered herein, no other or further

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

² Capitalized terms not otherwise defined herein are to be given the meanings ascribed to them in the Objection.

notice is necessary; and responses (if any) to the Objection having been withdrawn, resolved or overruled on the merits; and a hearing having been held to consider the relief requested in the Objection and upon the record of the hearing and all of the proceedings had before this Court; and this Court having found and determined that the relief set forth in this Order is in the best interests of the Debtors and their estates; and that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Objection is SUSTAINED as set forth herein.
2. Each Superseded Claim set forth in Schedule 1 attached hereto is disallowed and expunged in its entirety. The claims listed in the column titled “Surviving Claims” identified on Schedule 1 attached hereto shall remain on the claims register, subject to the Debtors’ further objections on any substantive or non-substantive grounds.
3. Should one or more of the grounds of objection stated in the Objection be dismissed, the Debtors’ right to object on any other grounds that the Debtors discover is preserved.
4. This Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object to or defend on any basis are expressly reserved with respect to any Superseded Claims referenced or identified in the Objection that is not listed on Schedule 1 attached hereto.
5. To the extent a response is filed regarding any Superseded Claim, each such Superseded Claim, and the Objection as it pertains to such Superseded Claim, will constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order

will be deemed a separate order with respect to each Superseded Claim. Any stay of this Order pending appeal by any claimants whose claims are subject to this Order shall only apply to the contested matter which involves such claimant and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters listed in the Objection or this Order.

6. The Debtors are authorized and empowered to execute and deliver such documents, and to take and perform all actions necessary to implement and effectuate the relief granted in this Order.

7. Nothing in this Order or the Objection is intended or shall be construed as a waiver of any of the rights the Debtor may have to enforce rights of setoff against the claimants.

8. Nothing in the Objection or this Order, nor any actions or payments made by the Debtor pursuant to this Order, shall be construed as: (a) an admission as to the amount of, basis for, or validity of any claim against the Debtors under the Bankruptcy Code or other applicable non-bankruptcy law; (b) a waiver of the Debtors' or any other party-in-interest's right to dispute any claim; (c) a promise or requirement to pay any particular claim; (d) an implication or admission that any particular claim is of a type specified or defined in this Order; (e) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Debtors' estates; or (f) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law.

9. This Order is immediately effective and enforceable, notwithstanding the possible applicability of Bankruptcy Rule 6004(h) or otherwise.

10. This Court shall retain jurisdiction with respect to any matters, claims, rights or disputes arising from or related to the Objection or the implementation of this Order.

Dated: _____
Wilmington, Delaware

The Honorable John T. Dorsey
United States Bankruptcy Judge

SCHEDULE 1

Superseded Claims

FTX Trading Ltd. 22-11068 (JTD)
Forty-First Omnibus Claims Objection
Schedule 1 - Superseded Claims

<u>Claims to be Disallowed</u>				<u>Surviving Claims</u>				
Claim Number	Name	Debtor	Filed Amount	Claim Number	Name	Debtor	Tickers	Ticker Quantity
2724	Name on file	FTX Trading Ltd.	\$5,297,487.81	55186	Name on file	FTX Trading Ltd.	1INCH-PERP	0.0000000000000000
							ADA-PERP	0.0000000000000000
							AMPL	0.000000003990687
							AVAX	0.076710287399540
							AVAX-0624	0.0000000000000000
							AVAX-0930	0.0000000000000000
							AVAX-PERP	0.0000000000000000
							BAL-PERP	0.0000000000000000
							BCH-PERP	0.0000000000000000
							BNB	0.001604222795460
							BNB-0624	0.0000000000000000
							BNB-0930	0.0000000000000000
							BNB-PERP	0.0000000000000000
							BSV-PERP	0.0000000000000000
							BTC-1230	0.0000000000000000
							BTC-PERP	0.0000000000000000
							CEL	0.011326810551982
							CEL-0624	0.0000000000000000
							CEL-0930	0.0000000000000000
							CEL-PERP	0.0000000000000000
							COMP-PERP	0.0000000000000000
							CREAM-PERP	0.0000000000000000
							CRV-PERP	0.0000000000000000
							CVX-PERP	0.0000000000000000
							DOGE-PERP	0.0000000000000000
							DOT	0.019024079984980
							DOT-0624	0.0000000000000000
							ETH	0.000200000645276
							ETH-0331	0.0000000000000000
							ETH-0930	0.0000000000000000
							ETH-1230	0.0000000000000000
							ETH-PERP	0.0000000000000000
							EXCH-PERP	0.0000000000000000
							FTM-PERP	0.0000000000000000
							FTT	1,000.085000000000000
							FTT-PERP	100,000.000000000000000
							HT-PERP	0.0000000000000000
							LDO-PERP	0.0000000000000000
							LEO-PERP	0.0000000000000000
							LTC-PERP	0.0000000000000000
							LUNC-PERP	0.0000000000000000
							MKR	0.0025000000000000
							MKR-PERP	0.0000000000000000
							OKB-PERP	0.0000000000000000
							OMG-PERP	0.0000000000000000
							PRIV-PERP	0.0000000000000000
							SLND	0.0030310000000000
							SNX	0.000000006682170
							SOL	0.001155743100030
							SOL-0624	0.0000000000000000
							SOL-0930	0.0000000000000000
							SOL-1230	0.0000000000000000
							SOL-PERP	0.0000000000000000
							SRM	2.2540899400000000
							SRM_LOCKED	168.024336920000000
							SXP-PERP	0.0000000000000000
							THETA-PERP	0.0000000000000000
							TRX	185,101.000000000000000
							TRX-PERP	0.0000000000000000

Claims to be Disallowed				Surviving Claims			
Claim Number	Name	Debtor	Filed Amount	Claim Number	Name	Debtor	Ticker Quantity
							USD 5,244,405.300883154763209
							USDC 20,000.000000000000000
							USDT 19,999.932235877677000
							USTC-PERP 0.000000000000000
							VET-PERP 0.000000000000000
							XRP-PERP 0.000000000000000
							YFI-PERP 0.000000000000000
85329	Name on file	FTX Trading Ltd.	\$0.00	25119**	Name on file	FTX Trading Ltd.	ZRX-PERP 0.000000000000000
							BTC 0.000002850000000
85331	Name on file	FTX Trading Ltd.	\$0.00	36428*	Name on file	FTX Trading Ltd.	USD 103,397.400000000000000
							BTC 0.000002720000000
							USD 103,813.630000000000000
384	Name on file	FTX Trading Ltd.	\$1,004,393.00	91605	Name on file	FTX Trading Ltd.	USDT 0.004058700000000
							1INCH-PERP 0.000000000000000
							AAVE-PERP 0.000000000000081
							ADA-PERP 0.000000000000000
							ALGO-PERP 0.000000000000000
							ANC-PERP 0.000000000000000
							APE-PERP -0.000000000000937
							APT-PERP 0.000000000000000
							ASD-PERP 0.000000000000000
							ATLAS-PERP 0.000000000000000
							ATOM 0.00000008097103
							ATOM-PERP 0.000000000000611
							AVAX 0.00000001519323
							AVAX-PERP -0.00000000001250
							AXS-PERP -0.00000000000014
							BAL-PERP -0.000000000000483
							BAT-PERP 0.000000000000000
							BNB-PERP -0.000000000000021
							BTC 0.000000020000000
							BTC-PERP 0.000000000000000
							C98-PERP 0.000000000000000
							CEL 0.00000000415414
							CEL-PERP 0.000000000000000
							CHZ-PERP 0.000000000000000
							COMP-PERP 0.00000000000115
							CREAM-PERP 0.000000000000000
							CRV-PERP 0.000000000000000
							CVX-PERP 0.000000000000000
							DOGE-PERP 0.000000000000000
							DOT-PERP -0.000000000000454
							DYDX-PERP 0.00000000001456
							EOS-PERP -0.000000000000909
							ETH 0.00000004003400
							ETH-0930 -0.000000000000003
							ETH-PERP 0.000000000000012
							FIL-PERP 0.000000000000682
							FLM-PERP -0.00000000007275
							FLOW-PERP 0.000000000000000
							FTM-PERP 0.000000000000000
							FTT-PERP -0.00000000000341
							FXS-PERP 0.000000000000056
							GALA-PERP 0.000000000000000
							GLMR-PERP 0.000000000000000
							HNT-PERP 0.000000000000170
							HT-PERP 0.000000000000000
							ICP-PERP -0.000000000000227
							JASMY-PERP 0.000000000000000
							KAVA-PERP 0.000000000000000
							KNC-PERP 0.000000000000000

*Surviving Claim is also included as a Surviving Claim in the Debtors' Fortieth (Substantive) Omnibus Objection to Certain Substantive Duplicate Proofs of Claim (Customer Claims)

**Surviving Claim is also included as a Surviving Claim in the Debtors' Thirty-Ninth (Non-Substantive) Omnibus Objection to Certain Superseded Proofs of Claim (Customer Claims)

Claims to be Disallowed				Surviving Claims				
Claim Number	Name	Debtor	Filed Amount	Claim Number	Name	Debtor	Tickers	Ticker Quantity
							KSM-PERP	0.0000000000000000
							LDO-PERP	0.0000000000000000
							LEO	0.000000000933714
							LEO-PERP	0.0000000000000000
							LINA-PERP	0.0000000000000000
							LINK-PERP	-0.0000000000000015
							LOOKS-PERP	0.0000000000000000
							LTC-PERP	0.0000000000000000
							LUNC-PERP	0.0000000000000000
							MANA-PERP	0.0000000000000000
							MATIC	0.0000000100000000
							MATIC-PERP	0.0000000000000000
							MINA-PERP	0.0000000000000000
							MKR-PERP	0.0000000000000010
							MNGO-PERP	0.0000000000000000
							NEAR-PERP	0.0000000000001818
							NEO-PERP	-0.000000000000468
							OKB	0.000000003742869
							OKB-PERP	0.0000000000000042
							OMG-PERP	0.0000000000000000
							ONE-PERP	0.0000000000000000
							OP-PERP	0.0000000000000000
							POLIS-PERP	0.0000000000000000
							RAY	0.000000008942303
							RAY-PERP	0.0000000000000000
							REN	0.000000008353747
							REN-PERP	0.0000000000000000
							RON-PERP	0.0000000000000000
							ROSE-PERP	0.0000000000000000
							RSR-PERP	0.0000000000000000
							RUNE	0.000000006823295
							RUNE-PERP	0.0000000000000003
							SAND-PERP	0.0000000000000000
							SHIB-PERP	0.0000000000000000
							SLP-PERP	0.0000000000000000
							SNX-PERP	0.0000000000001477
							SOL-PERP	0.0000000000000458
							SRM	11.039832020000000
							SRM_LOCKED	218.274591510000000
							SRM-PERP	0.0000000000000000
							STEP-PERP	0.0000000000000000
							STORJ-PERP	0.0000000000003808
							SUSHI	0.000000001560951
							SUSHI-PERP	0.0000000000000000
							THETA-PERP	0.0000000000000909
							TLM-PERP	0.0000000000000000
							TRX	0.000000007861434
							TRX-PERP	0.0000000000000000
							UNI-PERP	0.0000000000000390
							USD	1,004,393.000000000000000
							USDT	0.000000004938029
							USTC-PERP	0.0000000000000000
							XAUT	0.000000003413591
							XAUT-PERP	0.0000000000000000
							XRP-PERP	0.0000000000000000
							YFI	0.000000004083418
							YFI-PERP	0.0000000000000000
3002	Name on file	Cottonwood Grove Ltd	\$15,136,000.00	78947	Name on file	FTX Trading Ltd.	1INCH	168,824.508500000000000
							1INCH-PERP	-808.000000000000000
							ADA-PERP	-16,657.000000000000000
							ALEPH	47,279.857500000000000
							ALGO	3,390,578.878300000000000
							ALGO-PERP	-17,301.000000000000000

Claims to be Disallowed				Surviving Claims				
Claim Number	Name	Debtor	Filed Amount	Claim Number	Name	Debtor	Tickers	Ticker Quantity
							ANC	19,521.4943000000000000
							APE	1,588.7198300000000000
							APE-1230	0.0000000000000000
							APE-PERP	-1,341.299999998710000
							APT	759,689.6561000000000000
							APT-PERP	18.0000000000000000
							ATLAS	1,915,880.8530000000000000
							ATOM	1,496.2841200000000000
							ATOM-1230	0.0000000000000000
							ATOM-PERP	753.9600000000000000
							AUDIO	1,136,529.8605000000000000
							AURY	53,293.6037000000000000
							AVAX	43,709.5498598900000000
							AVAX-0930	0.0000000000000000
							AVAX-1230	13.799999999999600
							AVAX-PERP	351.400000000126000
							AXS	2,526.5029500000000000
							AXS-1230	0.0000000000000000
							AXS-PERP	202.0000000000000000
							BAND-PERP	-149.39999999996000
							BAR	36,894.9663000000000000
							BCH	394.4923130000000000
							BCH-1230	2.257000000000010
							BCH-PERP	-253.704999999968000
							BICO	2,079,532.7533000000000000
							BIT	207,224.1733000000000000
							BNB	1,501.6857605000000000
							BNB-1230	0.0000000000000000
							BNB-PERP	-164.199999999990000
							BSV-PERP	40.539999999972700
							BTC	2,233.066030134319600
							BTC-0325	0.0000000000000000
							BTC-0331	0.0000000000000001
							BTC-0624	0.0000000000000000
							BTC-0930	0.0000000000000000
							BTC-1230	-0.0898000000000513
							BTC-20210326	0.0000000000000000
							BTC-20210625	0.0000000000000000
							BTC-20210924	0.0000000000000000
							BTC-20211231	0.0000000000000000
							BTC-PERP	-0.676099999999993
							CHZ	9,132,018.1258655600000000
							CHZ-PERP	-86,590.0000000000000000
							CITY	35,464.5001800000000000
							COMP-PERP	-31.179399999980300
							CONV	6,019,434.2455000000000000
							CRO-PERP	-23,490.0000000000000000
							CRV-PERP	-19,369.0000000000000000
							DFL	35,269,188.4770000000000000
							DMG	1,966,938.9070000000000000
							DOGE	3,627,119.0663500000000000
							DOGE-0325	0.0000000000000000
							DOGE-0624	0.0000000000000000
							DOGE-1230	0.0000000000000000
							DOGE-20210924	0.0000000000000000
							DOGE-20211231	0.0000000000000000
							DOGE-PERP	-312,567.0000000000000000
							DOT	20,388.3077100000000000
							DOT-0930	0.0000000000000000
							DOT-1230	0.0000000000000000
							DOT-PERP	-3,496.1000000000000000
							ENJ-PERP	-849.0000000000000000
							EOS-PERP	1,217.799999995440000

Claims to be Disallowed				Surviving Claims			
Claim Number	Name	Debtor	Filed Amount	Claim Number	Name	Debtor	Ticker Quantity
					ETC-PERP		-295.599999999767000
					ETH		5,946.823915000000000
					ETH-0325		0.000000000000000
					ETH-0331		-0.517000000000141
					ETH-0624		0.000000000000000
					ETH-0930		0.000000000000000
					ETH-1230		-14.570000000006200
					ETH-20210625		0.000000000000000
					ETH-20210924		0.000000000000000
					ETH-20211231		0.000000000000000
					ETH-PERP		-31.262000000000100
					ETHW		4,734.214769100000000
					ETHW-PERP		-90.900000000033300
					EUL		105,578.524990000000000
					FIL-PERP		-720.799999999347000
					FTM		531,198.104400000000000
					FTM-1230		0.000000000000000
					FTM-PERP		-10,858.000000000000000
					FTT		23,430.548630000000000
					FTT-PERP		189.999999999701000
					GALA-PERP		35,430.000000000000000
					GALFAN		5,661.616550000000000
					GRT-PERP		56,816.000000000000000
					HMT		49,271.266400000000000
					HT-PERP		808.370000000034000
					HXRO		1,864,238.785958160000000
					INTER		25,174.032430000000000
					JOE		590,547.103900000000000
					KLUNC-PERP		-9,555.000000000000000
					KSHIB-PERP		1,355,715.000000000000000
					LDO		549,111.058049020000000
					LEO		338,473.824200000000000
					LINA		14,137,506.560500000000000
					LINK		13,368.855939000000000
					LINK-1230		0.000000000000000
					LINK-PERP		2,728.600000000990000
					LOOKS		690.370900000000000
					LRC-PERP		-58,252.000000000000000
					LTC		1,269.650103000000000
					LTC-PERP		120.420000000000000
					LUNA2		12,172.212720137000000
					LUNA2_LOCKED		80,101.641910319000000
					LUNC		635,721.520435000000000
					LUNC-PERP		368,000.000018107000000
					MANA		1,411.000000000000000
					MANA-PERP		25,792.000000000000000
					MAPS		59,525.000000000000000
					MASK		108,149.298500000000000
					MATIC		4,342,409.835850000000000
					MATIC-1230		0.000000000000000
					MATIC-PERP		-11,167.000000000000000
					MKR-PERP		-1.1040000000000500
					MPLX		10,278,465.632200000000000
					NEAR-PERP		-109.199999999253000
					NFT		
					(446940456354878638/MAG		
					IC EDEN PASS)		1.000000000000000
					NFT		
					(569854432628478700/OFFI		
					CIAL SOLANA NFT)		1.000000000000000
					OKB-PERP		11.329999999997600
					OMG		28.047200000000000
					OMG-PERP		-4,860.100000000000000

Claims to be Disallowed				Surviving Claims				
Claim Number	Name	Debtor	Filed Amount	Claim Number	Name	Debtor	Tickers	Ticker Quantity
							OP-PERP	-75,824.0000000000000000
							OXY	4,967,146.0063704400000000
							OXY_CUSTOM	54,263,307.9119795600000000
							PEOPLE-PERP	-807,570.0000000000000000
							PERP	1,145,480.1491150000000000
							POLIS	1,800.0000000000000000
							PSG	4,693.7561900000000000
							PTU	287,003.0901000000000000
							PYTH	259,999,998.0000000000000000
							RAY	2,805.2822000000000000
							RAY-PERP	-9,403.0000000000000000
							SAND	7,044.0000000000000000
							SAND-PERP	-4,822.0000000000000000
							SHIB	23,001,000.0000000000000000
							SNX-PERP	-1,667.7000000000000000
							SNY	719,197.4391000000000000
							SOL	30,008.8963485000000000
							SOL-0930	0.0000000000000000
							SOL-1230	-455.83000000000007000
							SOL-PERP	-949.0900000000000000
							SPA	6,916,995.6440000000000000
							SPELL	743,954.6500000000000000
							SRM	354,750.5247003500000000
							SRM_CUSTOM	183,490,288.2687870000000000
							SRM_LOCKED	945,672.8381448700000000
							SRM-PERP	564.0000000000000000
							SUSHI	23,173.8584500000000000
							SUSHI-PERP	-20,590.0000000000000000
							TRX	21,442.0000000000000000
							TRX-PERP	1,002.0000000000000000
							UMEE	9,109,504.4610000000000000
							UNI	200.4300000000000000
							UNI-PERP	256.399999999997000
							USD	9,686,544.3800000000000000
							USDT	98,083.0605590836000000
							USTC	0.1824630000000000
							VGX	294.2200000000000000
							WBTC	75.1868907920000000
							XPLA	4,627,778.8689500000000000
							XRP	17,186.8398500000000000
							XRP-PERP	37,551.0000000000000000
							XTZ-PERP	6,564.4490000007000000
							YFI	1.5835194000000000
							YFI-PERP	-0.076999999999663
2342	Name on file	FTX EU Ltd.	\$0.00	91462*	Name on file	FTX EU Ltd.	AKRO	1.0000000000000000
							AUDIO	991.9672210900000000
							AVAX	10.5195776200000000
							AXS	59.0320009700000000
							BAO	5.0000000000000000
							BTC	0.0865841300000000
							CRO	5,993.1883674300000000
							DENT	1.0000000000000000
							DOT	20.3021672700000000
							ETH	1.7396807500000000
							ETHW	70.4035544000000000
							EUR	0.004412512816541
							FTT	102.5174311500000000
							GST	3,974.3037954000000000
							KIN	4.0000000000000000
							RSR	3.0000000000000000
							SPELL	856,344.3680372800000000
							TRX	1.0000000000000000
							UBXT	2.0000000000000000

*Surviving Claim is also included as a Surviving Claim in the Debtors' Thirty-Seventh (Non-Substantive) Omnibus Objection to Certain Superseded Proofs of Claim (Customer Claims)

<u>Claims to be Disallowed</u>				<u>Surviving Claims</u>				
Claim Number	Name	Debtor	Filed Amount	Claim Number	Name	Debtor	Tickers	Ticker Quantity
							USD	0.029252600000000